

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HENDERSON CLARKE,

Plaintiff,

21-cv-01877 (NSR)

-against-

NOTICE OF MOTION

DET. CAMILO R. ANTONINI, Badge No. D111;
DET. SGT. SEAN J. FEGAN, Badge No. DS001; THE
CITY OF MOUNT VERNON; P.O. PATRICK KING,
Badge No. 2113; P.O. HOWARD, Badge No. 2163;
unidentified Westchester County Department of Public
Service Narcotics employees and officers; and unidentified
Mount Vernon Police Department employees and officers,

Defendants.
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PLEASE TAKE NOTICE, that upon the annexed Declaration of Loren Zeitler, Esq., Senior Assistant County Attorney, and Exhibit "A" attached thereto, the accompanying Memorandum of Law, and all prior pleadings in this action, the Defendant Westchester County by its attorney, John M. Nonna, Westchester County Attorney, by Loren Zeitler, Senior Assistant County Attorney, of Counsel, will move this Court before the Honorable Nelson K. Roman, United States District Judge, at the United States District Court, Southern District of New York, NY for an order dismissing the First Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure; and for such other relief as this Honorable Court deems just and proper.

Dated: White Plains, New York
July 30, 2021


Loren Zeitler (LZ2137)

To: All Counsel of Record